

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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IME WATCHDOG, INC.,

Plaintiff,

-against-

SAFA ABDULRAHIM GELARDI, VITO GELARDI,
GREGORY ELEFTERAKIS, ROMAN POLLAK,
ANTHONY BRIDDA, IME COMPANIONS LLC,
CLIENT EXAM SERVICES LLC, and IME
MANAGEMENT & CONSULTING LLC,

Defendants.

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Case No.: 1:22-cv-1032 (PKC) (JRC)

NOTICE OF MOTION

PLEASE TAKE NOTICE, that upon the accompanying Memorandum of Law, Plaintiff IME WatchDog, Inc. will move this Court at the Courthouse located at 225 Cadman Plaza East, Brooklyn, New York 11021, at a date and time to be determined by the Court, for an Order permitting Plaintiff to file exhibits under seal and redact selected portions of other documents submitted to the Court in connection with Plaintiff's supplemental brief concerning its compensatory damages and attorneys' fees for Defendants Safa Gelardi, Vito Gelardi, IME Companions LLC, Client Exam Services LLC, and IME Management & Consulting LLC.

Dated: Lake Success, New York
July 1, 2025

Respectfully submitted,

MILMAN LABUDA LAW GROUP PLLC

By: /s/ Jamie S. Felsen, Esq.

SAGE LEGAL LLC

By: /s/ Emanuel Kataev, Esq.

Attorneys for Plaintiff

Dated: Jamaica, New York
July 1, 2025